

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**SEALED**

UNITED STATES OF AMERICA

v.

JOQUENTZ CONSTANT

Defendant

- ) Criminal No. *19cr1001c*  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)
- ) Violation:  
)  
)
- ) Count One: Felon in Possession of  
)  
Firearm and Ammunition  
)  
(18 U.S.C. § 922(g)(1))  
)  
)
- ) Forfeiture Allegation:  
)  
(18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Felon in Possession of Firearm and Ammunition  
(18 U.S.C. § 922(g)(1))

The Grand Jury charges:

On or about August 25, 2018, in Dorchester, in the District of Massachusetts, the defendant,

JOQUENTZ CONSTANT,

having previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a black Regent .32 caliber revolver bearing obliterated model and serial numbers and containing 5 rounds of PPU .32 caliber ammunition and 1 round of WIN .32 caliber ammunition,

All in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**  
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further charges that:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1) set forth in Count One of this Indictment, the defendant,

**JOQUENTZ CONSTANT**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes the following: a Regent .32 caliber revolver that bears obliterated serial and model numbers and containing five rounds of .32 caliber PPU ammunition and one round of .32 caliber WIN ammunition.

3. If any of the property described in Paragraph 2, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant—

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or,
- (e) has been commingled with other property which cannot be divided without difficulty;

then, it is the intention of the United States, pursuant to Title 28, United States Code, Section

2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 2, above.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

  
\_\_\_\_\_  
MACKENZIE A. QUEENIN  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: January 15<sup>th</sup>, 2019

Returned into the District Court by the Grand Jurors and filed.

